

COOLEY LLP
WHITTY SOMVICHIAN (194463)
(wsomvichian@cooley.com)
AUDREY J. MOTT-SMITH (300550)
(amottsmith@cooley.com)
3 Embarcadero Center, 20th Floor
San Francisco, California 94111-4004
Telephone: +1 415 693 2000
Facsimile: +1 415 693 2222

MICHELLE C. DOOLIN (179445)
(mdoolin@cooley.com)
4401 Eastgate Mall
San Diego, California 92121-1909
Telephone: +1 858 550 6000
Facsimile: +1 858 550 6420

Attorneys for Defendant
GOOGLE, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JENNY HOUTCHENS, et al.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 22-cv-02638-BLF

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE BRIEFING SCHEDULE RE:
GOOGLE’S MOTION TO COMPEL
ARBITRATION OR, ALTERNATIVELY, TO
DISMISS PLAINTIFFS’ CLASS ACTION
COMPLAINT (L.R. 6.2(a))**

Date: October 6, 2022
Time: 9:00 a.m.
Courtroom: 3
Judge: Hon. Beth Labson Freeman

This stipulation is entered into by and between Jenny Houtchens (“Houtchens”) and Samantha Ramirez (“Ramirez”) (collectively, “Plaintiffs”) and Google LLC (“Google”) (collectively, the “Parties”), by and through their respective counsel:

WHEREAS, Plaintiffs filed their complaint (the “Complaint”) in the above-entitled action on April 29, 2022 (Dkt. No. 1);

1 WHEREAS, on May 27, 2022, under Civil Local Rule 6-1(a), the Parties stipulated to
 2 continue the deadline for Google to answer or otherwise respond to the Complaint until June 30,
 3 2022 (Dkt. No. 12);

4 WHEREAS, this Court approved the Parties' stipulation to continue Google's deadline to
 5 respond to the Complaint on June 1, 2022 (Dkt. No. 18);

6 WHEREAS, Google filed a Motion to Compel Arbitration Or, Alternatively, to Dismiss
 7 Plaintiffs' Class Action Complaint and Request for Judicial Notice ("Google's Motion") on June
 8 30, 2022 (Dkt. No. 21);

9 WHEREAS, this Court is scheduled to hear argument on Google's Motion on October 6,
 10 2022 at 9:00am (*id.*);

11 WHEREAS, this Court has additionally set a Case Management Conference for September
 12 15, 2022 at 11:00am (Dkt. No. 17);

13 WHEREAS, pursuant to Local Rules 7-3(a) and (c), Plaintiffs' opposition to Google's
 14 Motion is currently due on July 14, 2022 and Google's reply in support of its Motion is currently
 15 due on July 21, 2022;

16 WHEREAS, Civil Local Rule 6-2(a) permits parties to file a stipulation requesting an order
 17 changing time that affects the date of an event or deadline set by the Local Rules;

18 WHEREAS, to allow each Party sufficient time to prepare a complete and orderly
 19 presentation of the many issues presented by the Complaint and Google's Motion, the Parties have
 20 conferred and agreed to a short continuance of the briefing deadlines in connection with Google's
 21 Motion (Declaration of Audrey J. Mott-Smith ("Mott-Smith Decl.") ¶ 2);

22 WHEREAS, the Court previously approved the Parties' Stipulated Extension of Time to
 23 Respond to Complaint (Dkt. No. 18), and the Parties have neither stipulated to nor moved for any
 24 additional time modifications in this case (Mott-Smith Decl. ¶ 3);

25 WHEREAS, extending the deadlines for any subsequent briefing necessitated by Google's
 26 Motion will not alter the date of any event or deadline already fixed by Court order (Mott-Smith
 27 Decl. ¶ 4).

28 NOW, THEREFORE, pursuant to Civil Local Rule 6-2(a), the Parties jointly request that

1 the Court enter an order providing that:

- 2 1. Plaintiffs' deadline to file any opposition to Google's Motion will be July 28, 2022; and
3 2. Google's deadline to file any reply in support of its Motion will be August 18, 2022.

4
5 **IT IS SO STIPULATED.**

6
7 Dated: July 7, 2022

COOLEY LLP
MICHELLE C. DOOLIN (179445)
WHITTY SOMVICHIAN (194463)
AUDREY J. MOTT-SMITH (300550)

10
11 /s/ Audrey J. Mott-Smith

Audrey J. Mott-Smith
Attorneys for Defendant
GOOGLE LLC

12
13
14 Dated: July 7, 2022

JOHN RYAN GUSTAFSON (220802)
R. ALLEN SMITH (*pro hac vice forthcoming*)
STEFFAN T. KEETON (*pro hac vice forthcoming*)

15
16
17 /s/ Steffan T. Keeton

Attorneys for Plaintiffs

18
19
20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21
22 Dated: _____, 2022

23 _____
The Honorable Beth Labson Freeman
United States District Judge

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Audrey J. Mott-Smith, attest that concurrence in the filing of this document has been obtained from the other signatory. Executed on July 7, 2022, in San Francisco, California.

/s/ Audrey J. Mott-Smith

Audrey J. Mott-Smith

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